

EXHIBIT 22

1
2 UNITED STATES DISTRICT COURT
3 SOUTHERN DISTRICT OF NEW YORK
4 -----X
5 MARK I. SOKOLOW, et al.,
6
7 PLAINTIFFS,
8
9 -against- Case No:
10 04CV397 (GBD) (RLE)
11
12 THE PALESTINE LIBERATION ORGANIZATION, et
13 al.,
14
15 DEFENDANTS.
16 -----X
17

18 DATE: July 31, 2012

19 TIME: 3:05 P.M.

20
21 DEPOSITION of SHMUEL WALDMAN,
22 taken by the Defendants, pursuant to Notice
23 and to the Federal Rules of Civil
24 Procedure, held at the offices of Morrison
25 & Foerster, 1290 Avenue of the Americas,
New York, New York 10104, before Robert X.
Shaw, CSR, a Notary Public of the State of
New York.

1 Shmuel Waldman

2 A. No.

3 Q. I want to ask you a few
4 questions about the day that you were shot.

5 I understand that you were shot
6 in the leg and that the shooter was behind
7 you; is that correct?

8 A. Correct.

9 Q. Okay. Were you able to see the
10 face of the person that shot you?

11 A. I was not able to see the face
12 of the person when they shot me.

13 Q. Okay. I take it then that you
14 are not able to identify the person that
15 shot you?

16 A. Um, I mean, I do have pictures
17 of the scenery.

18 If you were to show me a
19 line-up of his face, no, I would not be
20 able to identify him on facial features.

21 Q. You don't know who he is; do
22 you?

23 A. I don't know who he is.

24 Q. You don't know what group he
25 might have been affiliated with?

1 Shmuel Waldman

2 Q. For the period from roughly
3 January of 2002 through January of 2005; is
4 that what you are saying?

5 A. It would be until June of 2004,
6 it is about two-and-a-half years.

7 Q. So you are saying that you were
8 under orders of your doctor to not work --

9 A. The first period I was not
10 ordered by doctors not to work, I mean --
11 it is a little bit of tough thing to get an
12 exact description, um, of how it was
13 qualified.

14 During the period of my
15 surgeries I was under the doctors' orders
16 not to work.

17 Q. Let me make sure that the
18 record is clear. You were shot on January
19 22, 2002.

20 A. Correct.

21 Q. You did not at that time have a
22 doctor's note saying that you could not
23 work; is that correct?

24 A. Um, I mean, I was in a
25 wheelchair and cast, and I don't remember